

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

RELENTLESS, INC., et al.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
U.S. DEPARTMENT OF COMMERCE,	:	Civil Action No. 1:20-cv-00108-WES-PAS
et al.,	:	
	:	
Defendants.	:	

STIPULATION AND PROPOSED ORDER SETTING BRIEFING SCHEDULE

Following the August 22, 2024 status conference with the Court, counsel for the parties have met and conferred and jointly propose the following to the Court for the purpose of scheduling the submission of supplemental memoranda in this case. The parties respectfully request that the Court endorse and adopt the following proposed schedule:

1. Plaintiffs will file their opening supplemental memorandum on September 27, 2024.
2. Defendants will file their opening supplemental memorandum/response to Plaintiffs' opening supplemental memorandum on October 25, 2024.
3. Plaintiffs will file their supplemental responding memorandum/reply memorandum on November 8, 2024.
4. Defendants will file their supplemental reply memorandum on November 22, 2024.

Stipulated and agreed to by the parties, through their respective counsel, this 3rd day of September, 2024.

/s/ Timothy J. Robenhymer (with permission)
Timothy J. Robenhymer, #4419
303 Jefferson Boulevard, 2nd Floor
Warwick, RI 02888
(401) 921-4800 Telephone
(401) 526-0302 Facsimile
tjr@lawofficesri.com

/s/ John J. Vecchione (with permission)
John J. Vecchione (admitted *pro hac vice*)
Kara Rollins (admitted *pro hac vice*)
New Civil Liberties Alliance
1225 19th Street NW, Ste. 450
Washington, DC 20036
Phone: (202) 869-5210
john.vecchione@ncla.legal
kara.rollins@ncla.legal

Attorneys for Plaintiffs

TODD KIM,
Assistant Attorney General
S. JAY GOVINDAN, Chief
MEREDITH L. FLAX, Deputy Chief

/s/ Alison C. Finnegan
Alison C. Finnegan, Senior Trial Attorney
(Pennsylvania Bar No. 88519)
U.S. Department of Justice
Environment & Natural Resources Division
Wildlife & Marine Resources Section
Ben Franklin Station, P.O. Box 7611
Washington, D.C. 20044-7611
Tel: (202) 305-0500; Fax: (202) 305-0275
alison.c.finnegan@usdoj.gov

Attorneys for Defendants

SO ORDERED:



Honorable William E. Smith
United States District Judge

Dated: September 13, 2024

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

/s/ Alison C. Finnegan